

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

AUG - 4 2009

ROBERT D. DENNIS, CLERK
U.S. DIST. COURT, WESTERN DIST. OF OKLA.
By *[Signature]* DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JOHN CHARLES FLETCHER,

a/k/a "Loc", "Big Loc",

Defendant.

No. CR-09-21-M

Violations: 21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 922(g)(1)
21 U.S.C. § 856(a)(2)

SUPERSEDING INDICTMENT

The Federal Grand Jury charges:

COUNT 1

From in or about late May, 2003, and continuously thereafter until on or about September 3, 2008, in the Western District of Oklahoma, and elsewhere,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----

together with LaTonya Ellison; Tuesday Johnson; Michael Thompson, a/k/a "Stocky"; Kevin Dewayne Wright, a/k/a "Peterman"; Lenora Wright, a/k/a "Big Baby", knowingly and intentionally combined, conspired, confederated and agreed with each other and with others, both known and unknown, to possess with intent to distribute and to distribute at least 5 kilograms of a mixture or substance containing a detectable amount of cocaine base (crack), and 1 kilogram of cocaine powder, Schedule II controlled substances, in violation of Title 21, United States

Code, Section 841(a)(1).

MANNER AND MEANS OF THE CONSPIRACY

The objects of said conspiracy were to be accomplished and were accomplished as follows:

1. During the period of the conspiracy, **JOHN CHARLES FLETCHER** and Kevin Wright would acquire quantities of cocaine powder, and cocaine base (crack), from Michael Thompson and others.

2. During the period of the conspiracy, **JOHN CHARLES FLETCHER** learned a method of manufacturing cocaine powder into cocaine base (crack) from Jarroll Marshall. **JOHN CHARLES FLETCHER**, Kevin Wright, Kenneth Miles, Lenora Wright, LaTonya Ellison and others, manufactured and or facilitated the manufacture, (cooking) of cocaine base (crack) from the cocaine powder. Members of the conspiracy provided items such as baking soda, scales, Pyrex containers, razor blades, stoves and microwaves to manufacture (cook or rock up) the cocaine powder into crack cocaine. To conceal and protect the manufacturing aspect of the operation, several locations were owned, rented, leased and used, including, but not limited to 3116 N.E. 12th Street (Kenneth Miles' residence), 3124 N.E. 15th Street (residence owned by **JOHN CHARLES FLETCHER**, but rented to Lenora Wright and LaTonya Ellison during a portion of the conspiracy), and 3105 N.E. 16th Street, (Donald Hastings' residence).

3. During the period of the conspiracy, **JOHN CHARLES FLETCHER**, Kevin Wright and others distributed cocaine base (crack) to others for re-distribution and use.

Transactions took place at 3116 N.E. 12th Street (Miles), 3124 N.E. 15th Street (residence owned by **JOHN CHARLES FLETCHER**), 3128 N.E. 15th Street (residence owned by Chrislene Fletcher, a relative of **JOHN CHARLES FLETCHER**) and other locations.

4. During the period of the conspiracy, members of the conspiracy used cellular telephones to maintain contact with each other and with their customers; to arrange for the acquisition and distribution of cocaine and crack cocaine; to arrange for the collection of drug proceeds; and to otherwise facilitate the conspiracy.

5. During the period of the conspiracy, **JOHN CHARLES FLETCHER** and others possessed, or had access to, firearms for the purpose of protecting the drugs, the locations where drugs were maintained, manufactured and sold, as well as money received from the sale of those drugs.

The Grand Jury incorporates by reference all the statements and allegations contained in Counts 2 through 39 inclusive, as though fully set forth herein.

All in violation of Title 21, United States Code, Section 846, the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 2

In or about the end of May, 2003, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed approximately one-quarter ounce (7 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled

substance, to Kevin Dewayne Wright, a/k/a "Peterman".

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(B).

COUNT 3

In or about the end of 2003, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed approximately one ounce (28.35 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, to Kevin Dewayne Wright, a/k/a "Peterman".

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(B).

COUNT 4

On one of three consecutive nights, in or about the end of August, 2005, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally possessed with intent to manufacture at least 4 1/2 ounces (127.57 grams) of cocaine powder, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(C).

COUNT 5

On one of three consecutive nights, in or about the end of August, 2005, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally manufactured at least 4 1/2 ounces (127.57 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, from cocaine powder.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 6

On one of three consecutive nights, in or about the end of August, 2005, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally possessed with intent to distribute at least 4 1/2 ounces (127.57 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 7

In or about September, 2005, at the Family Dollar Store at N.W. 36th and N. Pennsylvania,

Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
after having been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly and unlawfully possessed a firearm, that is, the Chinese version of an AK-47, which was in and affecting interstate commerce in that the firearm had previously crossed state lines to reach the state of Oklahoma.

All in violation of Title 18, United States Code, Section 922(g)(1), the penalty for which is found in Title 18, United States Code, Section 924(a)(2).

COUNT 8

On or about June 4, 2007, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed approximately 4 1/2 ounces (127.57 grams) of cocaine base (crack), a Schedule II controlled substance, to Kimberly Brannon.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 9

In or about the summer of 2007, at 3128 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally possessed with intent to manufacture approximately 1 kilogram

(1,000 grams) of cocaine powder, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(B).

COUNT 10

In or about the summer of 2007, at 3128 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally manufactured approximately 1 kilogram (1,000 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, from cocaine powder.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 11

In or about the summer of 2007, at 3128 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally distributed approximately 2 ounces (56.7 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, to Kevin Wright.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which

is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 12

In or about March, 2008, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed approximately 1/4 ounce (7 grams) of cocaine base
(crack), a Schedule II controlled substance, to Orlando Portwood for \$200.00.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which
is found in Title 21, United States Code, Section 841(b)(1)(B).

COUNT 13

On or about March 11, 2008, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed 124 grams of a mixture or substance containing a
detectable amount of cocaine base (crack), a Schedule II controlled substance, to Kimberly
Brannon, for \$2,500.00.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which
is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 14

From on or about April 17, 2008, until on or about December 11, 2008, within the Western
District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----

while managing and controlling a residence at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, as an owner and mortgagee and knowingly and intentionally, rented, leased, profited from, and made available for use, with and without compensation, the said residence for the purpose of unlawfully manufacturing, storing, distributing and using controlled substances, to-wit: cocaine base (crack).

All in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 15

During the week of April 20, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally possessed with intent to manufacture approximately 4-5 ounces (113-141.75 grams) of cocaine powder, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(C).

COUNT 16

During the week of April 20, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally manufactured approximately 4-5 ounces (113-141.75 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II

controlled substance, from cocaine powder.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 17

During the week of April 20, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally possessed with intent to distribute approximately 4-5 ounces (113-141.75 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 18

During the week of April 20, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, to Lenora Wright and LaTonya Ellison.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which

is found in Title 21, United States Code, Section 841(b)(1)(C).

COUNT 19

On or about Memorial Day, 2008, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
after having been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly and unlawfully possessed a firearm, that is, a semi-automatic pistol, which was in and affecting interstate commerce in that the firearm had previously crossed state lines to reach the state of Oklahoma.

All in violation of Title 18, United States Code, Section 922(g)(1), the penalty for which is found in title 18, United States Code, Section 924(a)(2).

COUNT 20

In or about May/June, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, in the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally possessed with intent to manufacture approximately 4 1/2 ounces (127.57 grams) of cocaine powder, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(C).

COUNT 21

In or about May/June, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, in the

Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally manufactured approximately 4 1/2 ounces (127.57 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 22

In or about May/June, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, in the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally possessed with intent to distribute approximately 4 1/2 ounces (127.57 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 23

At or near the end of June, but before July 4, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----

knowingly and intentionally possessed with intent to manufacture approximately 9 ounces (255.15 grams) of cocaine powder, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 24

At or near the end of June, but before July 4, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally manufactured approximately 9 ounces (255.15 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, from cocaine powder.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 25

At or near the end of June, but before July 4, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally possessed with intent to distribute approximately 9 ounces (255.15 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 26

During the week of July 14, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally possessed with intent to manufacture 4-5 ounces (113-141.75 grams) of cocaine powder, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(C).

COUNT 27

During the week of July 14, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally manufactured 4-5 ounces (113-141.75 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, from cocaine powder.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 28

During the week of July 14, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally possessed with intent to distribute 4-5 ounces (113-141.75 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 29

During the week of July 14, 2008, within the Western District of Oklahoma,
----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed a quantity of cocaine base (crack), a Schedule II controlled substance, to Lenora Wright and LaTonya Ellison.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(C).

COUNT 30

In or about the end of July/first of August, 2008, at 3105 N.E. 16th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----

knowingly and intentionally possessed with intent to distribute approximately 9 ounces of cocaine powder, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 31

In or about the end of July/first of August, 2008, at 3105 N.E. 16th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally manufactured approximately 9 ounces (255.15 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, from cocaine powder.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 32

In or about the end of July/first of August, 2008, at 3105 N.E. 16th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally possessed with intent to distribute 9 ounces (255.15 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

All in violation of Title 21, United States Code Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 33

On or about July 24, 2008, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed a quantity of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, to Lenora Wright, a/k/a "Big Baby".

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(C).

COUNT 34

In or about late July, 2008, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed approximately one ounce (28.35 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, to Kevin Wright.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(B).

COUNT 35

In or about August, 2008, at 3124 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally manufactured approximately 4 1/2 ounces (127.57 grams) of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, from cocaine powder.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(A).

COUNT 36

In or about early August, 2008, at 3128 N.E. 15th Street, Oklahoma City, Oklahoma, within the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a “Loc”, “Big Loc”,** -----
knowingly and intentionally possessed with intent to distribute approximately 5 ounces (141.75 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 37

In or about early August, 2008, at 3128 N.E. 15th Street, Oklahoma City, Oklahoma, within

the Western District of Oklahoma,

----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed approximately one-quarter ounce (7 grams) of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, for \$200.00, to Orlando Portwood.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

COUNT 38

On or about August 6, 2008, within the Western District of Oklahoma,
----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed approximately 1/4 ounce (7 grams) of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, to Kevin Wright.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(B).

COUNT 39

On or about August 15, 2008, within the Western District of Oklahoma,
----- **JOHN CHARLES FLETCHER, a/k/a "Loc", "Big Loc",** -----
knowingly and intentionally distributed approximately 1/2 ounce (14 grams) of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, to

Kevin Wright.

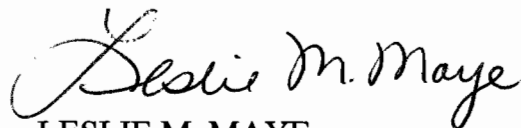
All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found in Title 21, United States Code, Section 841(b)(1)(B).

A TRUE BILL:

A handwritten signature in cursive script, appearing to read "Penelope E. [unclear]".

FOREPERSON OF THE GRAND JURY

JOHN C. RICHTER
United States Attorney

A handwritten signature in cursive script, appearing to read "Leslie M. Maye".

LESLIE M. MAYE
Assistant U.S. Attorney